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October 15, 2007

Ms. Jan Palumbo (AWT-121)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Subject: **October 15, 2007, Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the October 15, 2007, progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from September 15, 2007, to October 15, 2007.

Significant Developments This Period

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- On September 18, 2007, Baxter submitted to EPA a response to the July 19, 2007, disapproval and comment letter from EPA.
- On September 18, 2007, Baxter submitted to EPA the *Remedial Action Pilot Study Work Plan*.
- On September 25, 2007, Baxter submitted to EPA the *Remedial Action Pilot Study Performance Monitoring Plan*.
- On September 27th, Baxter installed eight boreholes in the vicinity of MW-3 and proposed remediation system trenches to assess subsurface conditions prior to construction of the Pilot Test Remediation system. In addition, one piezometer (DMW-3) was installed adjacent to well MW-3.
- On October 5, 2007, Baxter submitted applications to the City of Arlington for SEPA, Grading, and Right-of-Way permits.
- During the week of October 8, 2007, Baxter conducted groundwater monitoring activities in accordance with the *Revised Supplemental Dissolved-phase Groundwater Monitoring Plan*.

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Anticipated Developments Next Period

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter intends to have contractors mobilize to the facility during the week of November 5, 2007, to initiate elements of the *Remedial Action Pilot Study Work Plan*, pending EPA approval. Planned activities include installation of monitoring wells, piezometers, and construction of the pilot test remediation system. Installation of the system and wells are anticipated to take place over a four-week period.

Other Information

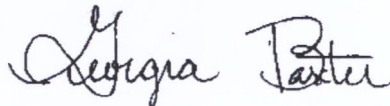
Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter has no other information to report.

Certification

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

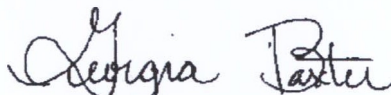
Signature:



Name: Georgia Baxter
Title: Chief Executive Officer
Date: October 15, 2007

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201

Sincerely,



Georgia Baxter
CEO

cc: Jeanne Tran, Ecology
RueAnn Thomas, Bluefield Holdings
Douglas Fox, Stella-Jones Corp.
J. Stephen Barnett, Premier Environmental Services, Inc.